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FEDERAL COMMUNICATIONS COMMISSION
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Before the
Federal Communications Commission
Washington, D.C. 20554

Access Charge Reform	CC Docket No. 96-262
Price Cap Performance Review for Local Exchange Carriers	CC Docket No. 94-1
Low-Volume Long Distance Users	CC Docket No. 99-249
Federal State Joint Board on Universal Service	CC Docket No. 96-45

To: The Commission

REPLY COMMENTS OF
TELEFÓNICA LARGA DISTANCIA DE PUERTO RICO, INC.

Telefónica Larga Distancia de Puerto Rico, Inc. ("TLD") submits these reply comments on the modified interstate access charge and universal service plan submitted by the Coalition for Affordable Local and Long Distance Service ("CALLS").

I. Introduction

TLD agrees with CALLS that its plan offers significant potential benefits with respect to the access charges of most price-cap carriers.[1] However, for the access charges of the Puerto Rico Telephone Company ("PRTC"), just the opposite is true.

PRTC presents a special case under the CALLS proposal. It is by far the largest local exchange carrier ("LEC") that is not currently under price-cap regulation. Through the partial privatization of PRTC in 1998-1999, GTE Corporation ("GTE") acquired control of PRTC, and

[1] See Comments of the Coalition for Affordable Local and Long Distance Service ("CALLS") (Apr. 3, 2000).

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PRTC became obligated to transition to price-cap regulation by March 2, 2000.[2] In the currently pending PRTC Price Cap proceeding, the Commission extended the deadline for price cap regulation of PRTC to July 1, 2000[3] – the same date that the CALLS plan is proposed to take effect.

Regulation of PRTC under the CALLS plan is not appropriate – because PRTC has extremely high embedded costs that reflect the fact that it has been until recently an inefficient, state-owned monopoly under rate of return regulation. Because the CALLS plan would eliminate the X-factor for common line access charges, these elevated PRTC costs would effectively be grandfathered by the CALLS plan. Furthermore, it appears that PRTC may qualify as a "rural carrier" under the CALLS plan, permitting it to further increase common line charges for multi-line business customers. For these reasons, the Commission should not regulate PRTC under the CALLS plan until it has fully examined PRTC's costs and has limited PRTC to recovery of only justified and economically reasonable costs.

II. PRTC's Common Line Costs Are Incompatible With the CALLS Plan

In PRTC Price Cap, PRTC predicted that its transition to price cap regulation would cause its carrier common line ("CCL") access charges to increase by approximately 300 percent,

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[2] *See* 47 C.F.R. § 61.41(c)(2) (requiring rate-of-return company that becomes affiliate of price-cap company to transition to price-cap regulation within one year); Petition for Waiver on Behalf of Puerto Rico Telephone Company, Inc., at 1, CCB/CPD No. 99-36 (Dec. 10, 1999) ("PRTC Price Cap Petition") (stating required transition date).

[3] See Puerto Rico Telephone Company Petition for Waiver of Section 61.41 or Section 54.303(a) of the Commission's Rules, CCB/CPD No. 99-36 (rel. Feb. 11, 2000) ("PRTC Price Cap").

primarily as a result of loss of Long Term Support ("LTS").[4] The resulting CCL rates would be far above those of other price cap carriers, as illustrated by the following table:

Carrier	Originating CCL Rate per Minute	Terminating CCL Rate per Minute	Total CCL Rate per Minute
Bell Atlantic	$0.0000	$0.0000	$0.0000
SBC	$0.0000	$0.0000	$0.0000
GTE (Michigan)	$0.0135	$0.0000	$0.0135
GTE (Ohio)	$0.0217	$0.0027	$0.0244
GTE (Kentucky)	$0.0228	$0.0034	$0.0262
PRTC (current NECA rates)	$0.0100	$0.0117	$0.0217
PRTC (proposed price cap rates)	$0.0430	$0.0430	$0.0860

Although TLD does not agree with PRTC's calculations of these elevated CCL rates (a point that TLD will address in other proceedings) and although the CALLS plan would alter CCL rates, the basic point is very clear – PRTC's common line access charges under the CALLS plan would be far out of line with those of other price cap carriers that would participate in CALLS.

The reason for this discrepancy in PRTC's common line rates is that PRTC has highly elevated costs. PRTC's embedded non-traffic-sensitive costs ("NTS") per line are more than 33 percent higher than the forward-looking economic costs for PRTC calculated by the Commission.[5] Furthermore, the embedded NTS costs of PRTC are by far the highest among the local exchange carriers ("LECs") that have comparable forward-looking costs and numbers of

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[4] See PRTC Price Cap Petition, at 10 (estimating originating CCL would increase from $0.01/minute to $0.043/minute and terminating CCL would increase from $0.0117/minute to $0.043/minute).

[5] See Table 1; Federal-State Joint Board on Universal Service; Forward-Looking Mechanism for High Cost Support for Non-Rural LECs, FCC 99-304; CC Docket Nos. 96-45 & 97-160 (rel. Nov. 2, 1999).

lines served. Based on 1997 data, the average annual NTS cost per loop of comparable companies was $268.45, while PRTC's cost was $446.78 – fully 66 percent higher.[6] Moreover, these data actually significantly understate the excessive nature of PRTC's costs, since PRTC's NTS costs per line for the tariff year 1999/2000 increased to approximately $530.46[7] – about 19 percent above its 1997 costs – while the NTS costs of price cap LECs presumably fell.

PRTC's costs and projected common line access charges are incompatible with the CALLS plan. Significantly, the CALLS plan would eliminate the X-factor for common line access charges.[8] Presumably, the justification for eliminating the X-factor is that the major price cap carriers have already had significant productivity-based reductions to their access charges as a result of a decade of price cap regulation. In PRTC Price Cap, PRTC has predicted that it would take until 2004 for its access charges under price cap regulation to fall to current levels – even with the current X-factor.[9] Elimination of the common line X-factor without a reduction in PRTC's costs would be devastating to TLD and other companies that compete with PRTC in Puerto Rico. Indeed, PRTC itself has stated in PRTC Price Cap that "[r]egional or smaller carriers [like TLD] facing a four-fold increase in PRTC's common line rates will not be able to

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[6] See Table 1.

[7] PRTC indicates that its CCL interstate revenue requirement for the 1999/2000 tariff year is $172,043,000. PRTC Price Cap Petition, at 6. Since only 25% of the CCL revenue requirement is allocated to the interstate jurisdiction, PRTC's total unseparated CCL revenue requirement for the 1999/2000 tariff year is $688,172,000. This unseparated CCL revenue requirement, divided by PRTC's total subscriber lines (see PRTC Price Cap Petition, Exhibit 3-A), results in an unseparated CCL revenue requirement per line of $530.46.

[8] See CALLS Modified Universal Service and Access Reform Proposal, ¶ 2 (Mar. 8, 2000) ("Modified CALLS Proposal").

[9] PRTC Price Cap Petition, at 10-11.

compete in Puerto Rico . . . ."[10] Without a common line X-factor, the competitive situation in Puerto Rico could likely be even worse.

III. The "Rural Carrier Safeguard" Potentially Makes the CALLS Plan Even More Inappropriate for PRTC

The CALLS plan includes a "safeguard" for "rural carriers" that permits "price cap carriers with at least 20% of total holding company lines serving statutory 'rural' study areas" to allocate a portion of switched access charge reductions to multi-line business subscriber line charges and CCL charges.[11] There is insufficient information in the CALLS proceeding to determine whether PRTC would qualify as a "rural carrier" under this provision. In particular, it is not clear whether "total holding company lines" would be calculated at the level of PRTC or at the level of GTE (which is PRTC's controlling parent).

The Commission should require GTE and PRTC to provide sufficient information to make the determination whether PRTC would be a "rural carrier" under CALLS. If PRTC falls into this category, then the CALLS plan would be even more inappropriate for it – because the plan would permit PRTC to increase further the already grossly elevated common line access charges that it would be permitted assess even without the "rural carrier safeguard".

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[10] Reply of Puerto Rico Telephone Company, Inc., at i, CCB/CPD No. 99-36 (Jan. 21, 2000).

[11] Modified CALLS Proposal, ¶ 3.2.4.1.

IV. The Commmission Should Conduct a Full Investigation of PRTC Costs

As TLD and several other parties have argued in PRTC Price Cap, the Commission should conduct a full review of PRTC's costs before permitting PRTC to complete the transition to price cap regulation.[12] This point is equally applicable whether PRTC transitions to price cap regulation under the CALLS plan or otherwise. It would be appropriate for the Commission's review to include an audit of whether PRTC's costs (and particularly its common line costs) are properly incurred, as well as a full accounting review of the manner in which PRTC's costs are used to calculate its interstate access charges (similar to the review that the Commission conducted before the transition of the large LECs to price cap regulation[13]). Furthermore, the Commission should grant a temporary waiver of 47 C.F.R. § 54.303(a), to permit PRTC to continue to receive LTS and prevent it from raising access charges during the pendency of a proceeding to review PRTC costs.[14]

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[12] See Reply Comments of Telefónica Larga Distancia de Puerto Rico, Inc., CCB/CPD No. 99-36 (Jan. 21, 2000) ("TLD Reply Comments"); AT&T Opposition to PRTC Waiver Petition, at 14-16, CCB/CPD No. 99-36 (Jan. 11, 2000); Comments of Sprint, at 6-9, CCB/CPD No. 99-36 (Jan. 11, 2000); Comments of the Asociacion de Proveedores Competitivos de Telecomunicaciones, Inc., at 13-15, CCB/CPD No. 99-36 (Jan. 11, 2000); MCI WorldCom Opposition, at 12, CCB/CPD No. 99-36 (Jan. 11, 2000); Reply Comments of Centennial Cellular Corporation, CCB/CPD No. 99-36 (Jan. 21, 2000).

[13] See Annual 1990 Access Tariff Filings, 5 FCC Rcd. 4177 (1990).

[14] See TLD Reply Comments, at 5-6.

V. Conclusion

For the reasons set forth above, the Commission should not regulate PRTC under the CALLS plan until it has fully examined PRTC's costs and has limited PRTC to recovery of only justified and economically reasonable costs.

Respectfully submitted,

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Table 1
Comparison of Embedded Non-Traffic Sensitive (NTS) and Forward Looking Eonomic Cost (FLEC)

State A	ILEC B	Total FLEC Monthly Cost per Line* C	Total Switched Lines* D	Unseparated NTS Cost per Loop per Year** E	Unseparated NTS Cost per Loop per Month F=E/12	Ratio between FLEC and NTS Cost G=F/C	% Increase in NTS Rev Req per Loop 1993-1997*** H
MI	Gte North Inc-Mi	$ 39.84	697,737	$ 298.53	$ 24.88	62%	-10.33%
OH	Gte North Inc-Oh	$ 38.79	890,916	$ 237.46	$ 19.79	51%	-13.04%
NC	Carolina Tel And Tel Co	$ 38.11	1,027,581	$ 254.20	$ 21.18	56%	-6.70%
OH	United Tel Co Of Ohio	$ 36.89	598,662	$ 256.02	$ 21.34	58%	-4.92%
WV	C And P Tel Co Of W Va	$ 36.83	813,899	$ 308.02	$ 25.67	70%	-9.71%
KY	Gte South Inc - Kentucky	$ 34.24	443,651	$ 302.51	$ 25.21	74%	-1.14%
KY	South Central Bell-Ky	$ 33.64	1,176,748	$ 294.51	$ 24.54	73%	5.16%
AL	South Central Bell-Al	$ 33.58	1,893,189	$ 256.18	$ 21.35	64%	1.96%
VA	Contel Of Virginia Inc Dba Gte Virginia	$ 33.26	548,223	$ 280.40	$ 23.37	70%	-5.32%
ME	New England Tel-Maine	$ 33.21	668,153	$ 279.37	$ 23.28	70%	-12.70%
IN	Gte Of Indiana	$ 30.82	758,234	$ 270.49	$ 22.54	73%	1.81%
PA	Gte North Inc-Pa And Contel	$ 29.67	541,947	$ 206.25	$ 17.19	58%	-19.11%
SC	Southern Bell-Sc	$ 29.07	1,422,217	$ 326.80	$ 27.23	94%	-14.54%
AR	Southwestern Bell-Arkansas	$ 27.96	960,914	$ 329.43	$ 27.45	98%	11.26%
PR	**PRTC and Puerto Rico Telephone Co**	**$ 27.89**	**1,087,749**	**$ 446.78**	**$ 37.23**	**133%**	**32.14%**
ID	Mountain Bell-Idaho	$ 26.89	528,261	$ 285.90	$ 23.83	89%	20.81%
NH	New England Tel-Nh	$ 26.72	769,880	$ 286.37	$ 23.86	89%	-13.58%
NE	Northwestern Bell-Nebraska	$ 26.03	530,068	$ 272.10	$ 22.68	87%	52.30%
NM	Mountain Bell-New Mexico	$ 25.85	787,901	$ 347.08	$ 28.92	112%	33.97%
OK	Southwestern Bell-Oklahoma	$ 25.79	1,615,026	$ 248.94	$ 20.75	80%	-0.72%
WA	Gte Northwest Inc - Washington	$ 24.44	769,382	$ 279.38	$ 23.28	95%	1.67%
KS	Southwestern Bell-Kansas	$ 24.41	1,351,910	$ 267.06	$ 22.26	91%	8.10%
IA	Northwestern Bell-IA	$ 23.82	1,113,218	$ 208.62	$ 17.39	73%	34.70%
OR	Pacific Northwest Bell-Oregon	$ 22.40	1,370,698	$ 287.25	$ 23.94	107%	18.25%
OH	Cincinnati Bell-Ohio	$ 22.35	746,699	$ 194.40	$ 16.20	72%	7.34%
DE	Diamond State Tel Co	$ 22.34	559,794	$ 211.25	$ 17.60	79%	1.54%
HI	Gte Hawaiian Telephone Co Inc	$ 21.77	716,211	$ 231.00	$ 19.25	88%	-4.17%
RI	New England Tel-Ri	$ 21.13	648,885	$ 228.53	$ 19.04	90%	6.41%

* Based on data in the Wire Center Support Spreadsheet located on the FCC's Accounting Policy Division website http://www.fcc.gov/ccb/apd/hcpm/.
**Source: Table 3.19 of the Federal-State Joint Monitoring Report Report issued in July of 1999.
***Based on data in Table 3.23 of the Federal-State Joint Monitoring Report Report issued in July of 1999.

CERTIFICATE OF SERVICE

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